

UNITED STATES DISTRICT COURT

Northern District of New York

6th Judicial Division

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JANE DOE, JOHN DOE.	)	
	)	Case No.3:24-cv-274 (MAD/ML)
	)	
Plaintiffs	)	
	)	
-against-	)	
	)	<b>DECLARATION OF</b>
	)	<b>JANE DOE</b>
	)	
JONATHAN REES aka GREG ELLIS	)	
aka JOHNATHAN REES aka JONNY REES	)	
aka JACOB LORENZO	)	
	)	
Defendant	)	
_____	)	

**DECLARATION OF JANE DOE IN SUPPORT OF REPLY FOR DEFAULT JUDGMENT**

I, JANE DOE, declare under penalty of perjury that the foregoing is true and correct:

1. I am the Plaintiff in the above-captioned action and submit this Declaration in support of my reply to Motion for Default Judgment against Defendant Jonathan Rees aka Greg Ellis aka Johnathan Rees aka Jonny Rees aka Jacob Lorenzo.
2. Upon information and belief, Defendant is not an infant, in the military or an incompetent person.
3. I respectfully submit my reply in support for motion for default judgment against Defendant after the Court ordered “the motion will be decided on the submission of the papers

only. No personal appearances are necessary.”

4. Defendant has continued to act in a retaliatory manner to harass, silence and discredit me with his exclusive derogatory websites set up about me, in a pattern of abuse he did to his ex-girlfriend as per Los Angeles Superior Court records, with emails by him threatening to set up exclusive websites about her and a podcast if she didn't do what he wanted showing a pattern of bad acts towards women **EXHIBITS 1-4**. See Dana Rees Declaration.

5. The videos on his exclusive websites about me are from his Ring cameras, which is the same edited video he submitted to friends of his in Chenango Sheriffs as part of his malicious prosecution against me with his dramatic “Attempted Murder” video with music and copy to suit his nefarious narrative against me, **EXHIBITS 5-6**. He also included personal emails from me to him on the website, although they have been edited with lies and misrepresented information, which he sent to my ex-husband and ex-sister-in-law, upon belief after finding their information from a custody petition I filed in Los Angeles Superior Court, in an attempt to create further issues for me, **EXHIBITS 7-8**.

6. Law Enforcement and Judges deal with violent criminals and other horrific abuse cases on a daily basis, and what Defendant has done to me and my children may not seem much in comparison, but it's a big deal to us and we have all suffered mentally, physically, emotionally and financially because of his bad acts. Not only has he disrupted mine and my children's lives, threatened their safe environment by false reporting numerous times to CPS, impacting our financial stability, my work environment, their schooling, film projects, doxed us putting us in harms way, he's also scared us with death threats leaving us afraid to answer the door, has put my liberty in jeopardy and therefore my children at further risk by fake reporting to his friends in Chenango Sheriffs that I attempted to kill him, when it's simply not true, it's all fabricated by him in a sick game that he likes to play with people's lives. He said the same about his ex-girlfriend, his ex-wife, and other associates who stand against him. He relies on low paid Deputy Sheriffs who are from a small local town, who he knows with his vast experience, he can manipulate and they'll believe him without question, just like Justice Lilley did from Smithville

Town Court and helped Defendant harm me. In my humble opinion, Justice Lilley shouldn't be on the bench with so much power over people's lives, and why I filed a complaint against him to the Commission for Judicial Conduct for misconduct, obstruction of justice, engaging in ex-parte communications, and violation of judicial conduct rules. Due to his friendship with Defendant, Justice Lilley should have recused himself, instead he helped his friend and used his position in authority and power to order a temporary OOP against me, pre-trial conditions and a restriction of movement, thereby impacting my ability to work or leave the area, without even hearing any particulars surrounding the case and why I reached out to Smithville Court via email on August 10th, 2023 prior to finding an Attorney, not knowing what to do in order to explain the circumstances, which Justice Lilley forwarded to Defendant's private email address greg@therespondent.com two days later on 12th August, 2023 after he issued a temporary OOP against me prior to my first appearance in front of Justice Lilley on the 22nd August, 2023, which is when I recognized Justice Lilley from photographs Defendant showed me of him and others at his property hunting, drinking and smoking cigars. When I asked Justice Lilley in Court if he knew Defendant, he said he didn't, which wasn't true. Defendant also submitted emails he received directly from Justice Lilley who forwarded them to Defendant, in his ex-girlfriend's case **EXHIBIT 11**, accusing me of harassing the Justice, when I did not, leading me to believe he filed all these documents in retaliation for me being a witness in his ex-girlfriend's case against him, and to use her case to expose my name and private information knowing the Court ordered for me and my children to proceed anonymously as Jane Doe and John Doe.

7. Defendant claims to be associated to some of the biggest names in Hollywood, including Johnny Depp and Alec Baldwin **ECF 20, Exhibit 2**. which he uses as part of his act to gain favors and help from enablers against his targets, including from young men in Law Enforcement. The pattern of abuse doesn't change, it's just a different woman, in a new location, but it always ends the same way with him trying to maliciously prosecute a woman to hide his criminal behavior towards them and others. Based on belief, he does always end up getting caught out when evidence doesn't line up with the facts and he changes his story multiple times

forgetting his own lies, which is why I'm 100% certain the case against me will be dismissed knowing I didn't do what he claims I did, but by then he's long gone and the damage towards his target, in this instance, me, is severe and is lifelong damage, potentially impacting my immigration status **EXHIBIT 40**, with lots of ramifications because of what he's done, including to my health and business. I have a lot of challenges to overcome because of Defendant's bad acts towards me. I've been treated as guilty as charged, rather than innocent until proven guilty in a court of law. If someone told me about a conspiracy that involved Defendant, a Justice, two Deputy Sheriffs, who lied to a Grand Jury in order for them to indict me, along with his involvement with Chief of Police, Rubin Roach, **EXHIBIT 13**, I'd never believe it, automatically trusting the Judicial process and all those involved, but as it's happened to me, my eyes have been opened to what can and does happen in a small town where there's not so many checks and balances and it only takes a few bad actors and a professional manipulator like Defendant to ruin a woman's life, which is what he's done to me and countless other women. My Attorney exposed the lies by two Chenango County Deputy Sheriff's **EXHIBIT 44**, plus, Defendant's video evidence has been edited badly in an attempt to support his narrative, which is also on the website about me, and bottomline, I didn't do what he accused me of, and there's no evidence to suggest I did what he said, other than Defendant's own complaint against me. I don't believe it will take much longer before Defendant's complaint against me is dismissed by Honorable Judge Revoir or Chenango District Attorney, who has not been directly involved in my case up to this point. When moving to a new location doesn't work to avoid arrest, based on belief and FOIA, Defendant gets 5150 in a mental institution for a few days, or a week or so, for treatment, instead of being charged for his crimes. He's got his act nailed down, but I do believe his luck is running out in NY, especially now he's been charged, see Rees Indictment, after a Special Prosecutor was appointed by Honorable Judge Revoir after Chenango Sheriffs refused to investigate or even act on the warrant issued against Defendant and protected him even after they took a handgun off Defendant, when he's received multiple DVRO's against him and isn't eligible for guns under Title 18 mentally defective, **ECF 24**, with red flag laws in place to protect

women, ignored by Chenango Sheriffs.

8. Defendant wrote in his declaration filed about me in his ex-girlfriend's case that I'm aligned with Roger Robinson, accusing us of working together to kill him, which he's also said about me and his ex-girlfriend, her private investigator, Kevin Berman, **EXHIBIT 10** and his ex-wife, none of which is true. Defendant is the one who told me Roger Robinson is married to his ex-wife, Dana Rees. If he hadn't told me that, I wouldn't know as I've never met or spoken with Roger Robinson and the first time I spoke with Defendant's ex-wife was on the 3rd January, 2025 to request a declaration from her to demonstrate to the Court the pattern of abuse, criminal complaints, unstable behavior and retaliation by Defendant spanning years, see Dana Rees Declaration. Defendant also accuses me of using different accounts on social media to harass him, when I do not. I've barely been on social media since November 2022 due to Defendant even though it's always been a useful tool given the nature of my work, and when I do, I am myself, but I had to stop using my full name due to the barbaric harassment by Defendant and his enablers **EXHIBIT 12**.

9. I'm a very private person and why I work behind the camera as a director, producer and writer, not in front of the camera working as an Actor, which Defendant knew and has seemed to enjoy airing my dirty laundry about my divorce to my ex-husband on the website about me, and on social media, even though we divorced 10 + years ago, which is nothing to do with Defendant or others, along with him adding straight out lies and misrepresented information to dramatize the relationship. Defendant has put myself and my children on the map to deal with scary individuals like Vem Miller, who he recruited to help him locate me and my children, harass and scare us, and obliterate my reputation with the websites and leaflets about me. I haven't been exposed to a violent criminal world and neither have my children, who have been intentionally harmed by Defendant's egregious harassment by sharing the "Attempted Murder" video of Plaintiff to her minor children's friends in their school **EXHIBIT 15**, removed from their school twice after Defendant called their school, leading to Plaintiff having to appeal the decision to remove them with the Education Commissioner, **EXHIBIT 24 and 25**, see John Doe Declaration

and Katie Simek Affidavit. I worked hard to create a great life for me and my children as law abiding citizens. We had goals, dreams, and he's disrupted all of our lives, impacting my children with their schooling, which has already caused them issues with two of my children unable to graduate on schedule, my film project pulled from distribution due to Defendant's friends/enablers Michael Maloy and Mark Skipper aka Skip Archimedes sharing information Defendant sent them about me, to the distributor, along with a link to the website, which is hard for people to not believe is true given it's on the internet. My reputation is completely ruined, I can't even use my full name anymore because the minute anyone looks me up on IMDB **EXHIBIT 14**, they'll find a profile full of lies after Defendant adapted my business profile more than 20 times. Same for Google, which happens in my line of work with people researching me, with the website number one and freaks people out that they'd be working with an "Attempted Murderer", "Thief", "Fraudster". Even people who don't believe it's true, they don't want to work with me because they don't want to be dragged into a drama with Defendant and after what he's done to me, I don't blame them, it's brutal.

10. Defendant mentions Mr. Roland Bougas on his exclusive website about me, stating that I scammed him out of his life savings leaving him homeless suffering with leukemia, along with a staged video filmed at Defendant's house in Chenango County, which he also text to my ex-landlord, **EXHIBIT 22**, see Thomas D'Angelo affidavit, and emailed to District Attorney Michael Ferrarese, **EXHIBIT 17** included in his filings about me in his ex-girlfriend's case, when in reality, I lost my deposit after walking away from buying Mr. Bougas's house in Oxford given it was only 10-15 minutes away from Defendants home, which made sense when we were working together on his television series, 16 hour days, 6 days per week, but not a good idea to be so close to Defendant after walking away from him, receiving non-stop "I love you" voicemails, which I ignored, followed by suicide messages **EXHIBIT 18**, over and over from Defendant if I didn't do what he asked and him showing up at my home in Broome County at odd hours, insisting on me helping him, forcing me to turn off my devices or "they" would find him, then death threats "Your reactivity will get us killed", **EXHIBIT 21**. He fakes documents

and lies in order to recruit enablers, including misogynistic men like Vem Miller, who hates women as much as Defendant and with the belief, I'm the monster Defendant portrays me to be, him and his enablers of abuse can justify their bad acts and abusive behaviors towards me and my children. Vem Miller brags in spaces on X, which are recorded, that him and others in his group, harass people until eventually they "off" themselves, even mentioning in October, 2024 that they did this to Las Vegas Judge, Mathew Harter, but their hands are clean because they didn't shoot the gun. This is extremely disturbing to me and I have to protect my children from these unstable men.

11. Defendant has a skill at turning people against his targets, who are frightening and women haters. He has doxed my name, address and other personal information on the website, stalking me to find out where we are staying, with one hotel concerned about a creepy call asking about me, that the front desk worker flagged it up to the hotel manager about what was said and she wrote a letter for me, **EXHIBIT 23**, which I gave to the School District, **EXHIBIT 24**. I have no idea how he tracked me, but this has happened at two hotels I am aware of. He has turned people like Michael Weisberg against me believing his story **EXHIBIT 16**, who then retaliated against me and my children in the worst way imaginable, forcing us to flee our home, which is disruptive and harmful for my children and then he filed criminal action against me claiming I caused over \$20,000 worth of damage to his property, which is not true. It only takes a trigger friendly, not too smart person to do something stupid following Defendant like he's a leader of a cult, believing I'm dangerous, an "Attempted Murderer", when I'm not. One of Defendant's enablers burned an Israeli flag and is on the front cover of a tabloid newspaper, which to me is worrying behavior, and always seems to be the same sort of unstable men Defendant recruits to harass me, locate where we are, help him with leaflets, websites... which I am distressed about and why myself and my children are careful not to disclose where we live, not answer the door without knowing who it is and if located, we move immediately, no hesitation. In December 2024, an independent journalist/podcast host from Chicago called Nicholas J. Fuentes was doxed on X and a week later a man he didn't know showed up at his

home with a gun and crossbow in a motorcycle helmet. Fortunately, he was spotted on camera with a gun in his hand at the front door waiting for the door to open and the Police were called, which resulted in two dogs being killed and the perpetrator neutralized by the Police. This is what Defendant is doing to me by doxing my address, enraging men against me to harm me and/or my children, when we have the right to privacy under the Law. It's not a good way to live and I'll forever have to be looking over my shoulder, with security measures in place for me and my family. Defendant is not an incompetent person, but he is still mentally defective **ECF 24, Exhibit 4**, and dangerous with an axe to grind against women who walk away from him and/or threaten his fake persona.

12. I have been clear from the outset of my Complaint against Defendant that he used my identity and committed forgery in order to maliciously prosecute his ex-girlfriend, in the same manner he has done to me. Defendant is now claiming I'm his ex-girlfriend's associate to suit his victim narrative, but the reality is I've never met his ex-girlfriend, I only knew him, personally and in business, working on his television project, which I worked on with the promise of payment, which he never fulfilled **EXHIBIT 27**. He is the common denominator and dragged me into his messy situation after he committed crimes, that had nothing to do with me, creating long standing problems for me by filing falsified statements he claimed were from me, when they were not, leading to my name and brand being damaged due to association to him, which then turned retaliatory by him and his enablers of abuse when he discovered I had reported crimes to Law Enforcement spanning months from January, 2023 to mid-July, 2023. He contacted Producer Eric Foster on March 13th, 2023 **EXHIBIT 20**, in retaliation for me filing a police complaint against him, which led to a Welfare check due to his threats of suicide.

13. After I was subpoenaed as a witness in his ex-girlfriend's civil lawsuit against Defendant on May 13th, 2024, which Plaintiff is not a party to, Defendant retaliated against me further, with his latest filings in her case with what seems like 90% about me, nothing to do with his ex-girlfriend or her case against him, merely a couple of weeks ago with him continuing to harass me by submitting repetitive derogatory false information about me with zero significance to his



ex-girlfriend's lawsuit against him, with hundreds of pages filed by Defendant about me. He also had an on the record conference, transcript attached, **EXHIBIT 26** with Magistrate Judge Lovric, who warned him not to speak as it could be used against him, yet, he still continued to falsely claim I attempted to murder him, which is just nonsense. All information he submitted is public and on his ex-girlfriend's docket, **ECF 37, 78, 82, 84, 86** which comes across to me as unstable, pure rage and retaliation, and a way for him to continue his abuse against me, when he simply could have filed a response to my Complaint if he had anything to say, but chose not to, instead he's submitted hundreds of pages about me in a case I am not a party in.

14. Defendant is a Court professional who knows NY won't extradite him for violating the OOP and why I need a real solution against Defendant that will stop him from harming me or my children further. I believe by him having to pay out significant damages to me, including punitive damages for his egregious bad acts, he might learn there's actual consequences for his bad behavior, which isn't normal and is unacceptable in a civilized society, and hopefully will stop him harming me and my children further. Same for his enablers too. I've never filed a lawsuit against anyone prior to dealing with Defendant, but given neither him or his enablers can be negotiated with, I'm hoping by holding him and some of his enablers accountable in Court, others who Defendant recruits against me in the future will understand I won't hesitate to file civil action against them with financial consequences for their bad acts, deterring them from participating in his games. It's not a guarantee, but I'm preventative and have to try to get my family back to civility and my children back on track with their studies, future careers and life goals. I believe a permanent injunction enjoining him from disseminating anymore personal information about me and my children, especially videos and photos during the period we were staying at his property with his threats to share videos and images of myself or my children showering, on the toilet or changing in the bedrooms, is an important preventative measure in the hope it will stop him doing any further damage to us, especially my children, understanding there will be severe consequences if he violates an order from a District Judge.

15. I'm very afraid of what he will continue to do to me and my family, but like I said in my

declaration in support of my Motion for Default Judgment, I'm more afraid of living like this the rest of my life and don't think my health can take much more stress, with the lump in my left breast growing larger over this last 8 months, and two fingers on my right hand frozen, which the doctor said is due to my immune system being compromised. I've never been as ill as I have been over the last 17 months, which isn't helped by gaining weight due to the stress Defendant is causing me and the financial strain my family and I are under given Defendant and his enablers have ruined my reputation in the industry and intentionally got my latest film Quest For Youth pulled from distribution due to their bad acts, **EXHIBITS 28-38** resulting in loss of earnings, zero return of investment, and after all the damage he's done, I don't believe I will recover in the Film Industry and will have to find a new career, which may not be easy at 50 years old.

16. Defendant uses a stage name Greg Ellis and why the OOP's against him and court records don't show up when he's researched. He's clearly not impacted by his bad acts as he just wrapped on Angry Birds Mystery Island earning substantial sums as a SAG-AFTRA entertainer.

17. Defendant spews his rhetoric with his enablers regurgitating his narrative online that I deserve this treatment because I had children with a child sex rapist, **EXHIBIT 12**.

18. It's a long drawn out process, but I am 100% sure the criminal case against me in Chenango County will be dropped given Defendant is not credible, with faked edited video evidence, and his complaint against me complete lies and the ramblings of an unstable abuser who will do anything to maintain his victimhood persona, which he utilizes to sell books et cetera, but the damage to my name, my reputation and my career is lifelong,

19. It's hard enough working as an Independent Filmmaker competing against huge Studios without not being paid for work I did on Defendant's documentary series. As the writer of the 10 episodes, I should have received payment of \$47,950, along with \$60,000 as the producer, which I agreed to do at a reduced rate on the basis I'd receive my full rate as the Director, although the payment was split with 40% of my Director fee \$226,369 upfront, with 60% of my fee \$339,552 deferred until distribution of the project **EXHIBIT 27**. I helped raise the finance for Defendant's television show, which is part of my job as a Producer, even flying to Las Vegas to meet with

investor Doug Ansell who invested \$300,000 into Defendant's television project, only for Defendant to remove me from the bank account after the finance was raised. A few months later, Defendant threatened me in an attempt to get me to sign an agreement as the Senior Producer to advance him funds he had already spent and sent numerous emails to me about this matter, which I can provide at any time. I was unhappy as I hadn't been paid for my work as the writer who created the episodes, producer or the director, which is a lot of work spanning many months. Defendant also tried to get me to sign the financial statement to close down his Charity "Children and Parents United" at the same time, which I also refused to do. A handful of others I worked with text me asking for help as he was acting unstable and threatening towards them after they also refused to sign the financial statement to close down his Charity, which has raised significant public funds with some donors reaching out to Plaintiff to help get their money back with Defendant using mine and other industry people's profiles on his Charity website to add credibility to his endeavor. Defendant refused to return money to investors, including Patrick Brennan, Esq. who based on belief, Defendant told he didn't have access to the bank account, but I did, which was not true. Patrick Brennan, Esq. asked me to send him the text messages to prove Defendant had lied to him, which I did, **EXHIBIT 19**. I was never reimbursed for any expenses, including flights to Las Vegas, NY, or Defendant's abuse of my Wegmans app that he used without my permission to order more than \$3,500 worth of groceries and alcohol for himself, nor the \$3,000 plus, he insisted I paid him on arrival at his house for Thanksgiving via Apple Pay, or for items he stole, like my Vitamix and accessories or camera equipment he destroyed.

20. Events leading up to Plaintiff being removed from the television series bank account as a dual signatory by Defendant, involved months of waiting for Defendant to sign off on payroll in order to pay the crew and myself, and on or around December 6th, 2022 after myself and my children had left Defendant's property after abuse and horrific circumstances, I received a call from banker Cherie Castle while I was driving to the Hilton Hotel in Vestal, NY who told me \$100,000 had been removed from the television series bank account in \$5,000 increments and she asked me if she could freeze the money before it left the bank, which I agreed to do as it

sounded like fraud. Defendant called me angry and was extremely threatening towards me blaming me and yelling at me on the phone to agree to unfreeze the account, which I wouldn't agree to do until facts could be established on what happened to the money. It was confirmed to me by the bank that the Defendant had been the person to remove the money to one of his personal accounts and seemed based on belief he was trying to remove the rest of the money too with low payments so I wouldn't notice immediately. I wasn't happy about not being paid and also wanted to ensure the Line Producer, Crew and Designers who had been waiting many months for payment were in fact paid. As part of the agreement to unfreeze the account, Defendant had to make a payment to cover some of the outstanding invoices, and crew payroll, which he did reluctantly with the banker removing the money to ensure it was paid as agreed. He was livid about this and immediately after the account was unfrozen, I was removed from the bank account on or around the 8th December, 2022. I have multiple emails, which includes Cherie Castle and Defendant to confirm these events if required. Defendant then insisted I went on Zoom meetings with him and his manager Thomas Harrison angry that the Line Producer, Crew and Designers had been paid for some of their work up to that point. Each time I spoke on Zoom, Defendant muted me. Knowing it was pointless, I removed myself from each of the meetings and begun working on terminating the written contract I signed with Defendant. I received multiple calls from Thomas Harrison, who said he agreed with my position on this and we continued to work together for another year until January, 2024 when I terminated the agreement with Vanguard Management. I have not been paid for any of the work I personally did on Defendant's project and why I'm claiming forced labor under false pretenses.

21. The love bombing to get me back started after he received notice of my removal from the project along with a termination agreement for him to sign in January, 2023. I received apology voicemails from him for hurting me, begging me to come back, which I wouldn't do. Then came the suicide phase in February, 2023, which did work on me as I believed him that he was going to kill himself, which was beyond stressful. I had never dealt with that level of manipulation before to know I was being played, and didn't know at that time it was part of his act and typical

pattern of abuse to get what he wants and I was desperately trying to save his life believing his story that he was going to kill himself, which I didn't want to happen, not even after everything he had done to me and my children at his property and the months leading up to this period. Then came the death threats, which he's good at writing in a word salad so I knew they were a threat and a warning on mine and my children's lives, either by him or by others, who he wrote were a threat to him, me and my children, but were not direct threats to prosecute under the Law. He's honed his skills over years, but his rage gets the better of him and why he makes multiple mistakes and exposes himself for the abuser that he is, it's just paying attention to the details and understanding the patterns, which are now easy for me to spot after more than two years of dealing with him and reading his history of abuse towards other women from their court documents against Defendant. He's consistent and from what I have experienced and read in his other cases, he doesn't seem to deviate from his pattern.

22. He finally signed the production termination agreement in and around March, 2023 after he found out I had reported him to Law Enforcement, with harassment and stalking non-stop ever since up to filing my reply on the 6th January, 2025. To understand who he is, as an example, he's told me repeatedly Kevin Berman "KB" is trying to kill him, **EXHIBIT 18 and 21**, which I've shared a small amount in these filings to showcase this, but yet it was Kevin Berman who talked Defendant off the suicide ledge prior to me receiving these text messages from Defendant, see Kevin Berman declaration from a case against Defendant in Los Angeles.

23. I've witnessed the majority of people that know him and I, appeasing him so not to deal with the full wrath of what happens if you become a target by him, like the website he set up about me, reaching out to business associates to ruin careers, and why people, including me, even after all he had done up to August, 2023, it seemed best to try and help him organize his debts with creditors and assist him to sell his house as per his request after he reached out to me with promises of payment for owed sums for work I did, and with multiple investors in touch with me relying on me to resolve this issue for them with Defendant, is the only reason I agreed to go to his property to help him, which I hoped would then result in me getting back to a

peaceful existence if Defendant left the area and settled outstanding debts, not realizing his harassment and retaliatory plan against me had gone into overdrive the moment it was confirmed in his mind as per his history, that I was a traitor, his enemy after I had filed police reports against him endangering his fake persona, and why he was determined to silence me given all I know about him and his crimes.

24. I did have a deep rooted fear that Defendant was planning to hurt me physically at his property on the 8th August, 2023 and even my daughter told me she thought it was a trap, but I had to go because if I didn't, he would have shown up at my property as per his history at all hours, in the middle of the night, early morning, putting my children in harms way, even by an accident with him acting delusional, reckless, and why I wanted to avoid Defendant coming to my home again, especially with my children off school for the Summer. I received zero help from Law Enforcement after I had filed multiple police reports spanning months from January, 2023 to July, 2023 begging for their help with the last report filed to NYSP Trooper Reese in July, 2023 who told me they are a reactive agency and he didn't believe me, which is when the penny finally dropped that I was on my own to deal with Defendant and hoped his intentions were pure and he would take my help, pay me and investors, then move like he said he was doing.

25. Fortunately, my military survival training kicked in and why I was able to leave his property alive. None of what Defendant said in his complaint against me is true and I didn't harm him, nor would I, but he has physically hurt me with a history of unstable, erratic, violent and delusional behavior. He's created a sick drama with a narrative that is like a film script, not even remotely close to reality with zero evidence to back up his story, with evidence confirming my version of events. Like Kevin Berman, I talked Defendant off the suicide ledge multiple times, so it doesn't make sense that I would then try to kill him a few months later as he claims. I don't believe Defendant deserves to die, but I do believe he should be held accountable for what he's done to me and my children through legal remedies, like damages, injunction, prison. Contrary to what him and his enablers have shared, I'm not a violent person and there is no-one in my past

that would say otherwise, physically or verbally, not even a disgruntled ex-employee who has been fired, it's not who I am. I'm all about enhanced communication to resolve conflicts. My children will attest that "punishment" in our home involves loss of privileges, like screen time, increased chores, never violence, screaming at them or smacking... for me it's about educating, helping them to learn and grow, not hurting or traumatizing my children. One of the CPS Caseworkers (I believe the last one) told me after interviewing my children at their school and visiting our home that she can see we are a close, happy "nuclear family", which I believe Defendant intentionally tried to destroy with his false reports. Even now, and I believe people in my life will swear to this if required, I'm not angry at Defendant, not even after everything he's continued to do to me and my children from August, 2023 until filing this reply to motion for default judgment on the 6th January, 2025 with him ramping up his abuse times a thousand, recruiting enablers against me, malicious prosecution, harassment, stalking, et cetera, which has been extreme, brutal, leaving me with significant challenges, but I do want him out of our lives, never to have to deal with him or his enablers again, able to get back to work, de-stress, heal my body and mind from what he's done, live my life in peace and watch my children grow up without concern they are in harms way or that he'll retaliate against myself or them in the future due to his sickness, which I believe is a form of psychopathy, a dark personality narcissist and why he won't stop until he's stopped by the Judicial System or ordered to pay significant monetary damages, feeling it in his pocket for his bad acts towards me and my children.

26. I respectfully request the court accepts this declaration in support of my Reply to Motion for Default Judgment and Exhibits.

## **II. BASIS FOR ENTERING A DEFAULT JUDGMENT**

27. Federal Rule of Civil Procedure 55(b) provides for a court-ordered default judgment following the entry of default by the court clerk under Rule 55(a).

28. On April 4th, 2024, Defendant was served with a copy of the Summons and Amended Complaint. ECF 17.

29. On May 1st, 2024, a Clerk's Certificate of Default was entered. **ECF 21.**

30. The Court reset the deadlines instructing Defendant to Respond to Plaintiff's Motion for Default Judgment by January 3rd, 2025, with Reply from Plaintiff by January 10th, 2025.

Defendant has neither filed an answer with the Court, responded to the Complaint or otherwise formally appeared in this Action. More so, Defendant has never contacted either myself or the Court at any time to request an extension of time to appear.

31. As aforementioned, Plaintiffs have complied with Federal Rule of Civil Procedure 55(a).

32. Therefore, Plaintiffs respectfully request that the Court enter default judgment against Defendant.

### **III. DAMAGES**

33. Plaintiff respectfully reiterates her request to receive at a minimum the following:

#### **A. Damages for Child Endangerment, Child Maltreatment, Harassment, Stalking, Gender Violence, Violation of Civil Rights, et cetera**

34. Plaintiff requests, at a minimum, \$150,000.00 each count for Child Endangerment, Child Maltreatment, Violation of Civil Rights, Harassment, Stalking, Forgery, Identity Theft, and the cost of the action, including reasonable litigation costs reasonably incurred. 15 U.S.C. § 6851(b)(3)(A)(i). Plaintiff has actual damages in emotional distress because of Defendant's conduct. The Northern District awards damages in the amount of \$300,000 to \$500,000 in damages based on the emotion distress suffered by Plaintiff (Angulo v 36th St. Hospitality LLC, 2020 US Dist LEXIS 137816, at \*38 [SDNY July 31, 2020]; see also, Villalta v JS Barkats, P.L.L.C., 2021 US Dist LEXIS 75071, at \*47 [SDNY Apr. 16, 2021, No. 16-CV-2772 (RA) (RWL)]).

#### **B. Claims for Intentional Infliction of Emotional Distress**

35. To the extent emotional distress damages and punitive damages are not included in an award of damages under A, it is respectfully requested that the sum of \$300,000 be awarded for each emotional distress count. Plaintiff also requests a ratio of 3:1 for punitive damages under



the state law statutes damages (see Olson v Brenntag N. Am., Inc., 69 Misc 3d 1214[A], 2020 NY Slip Op 51315[U], \*44 [Sup Ct, NY County 2020])[the First Department and other departments of the Appellate Division have affirmed or adopted damage-award ratios greater than 1:1 (or for that matter 4:1)].

**C. Claims for Distress**

36. As a result of Defendant's conduct, Plaintiff lost contracts she was working with. Plaintiff estimates at a minimum \$2,500,000 in lost profits, **EXHIBITS 28-38**.

**D. Costs**

37. Civil Rights Law 52-B, NYC Admin Code 10-180, and 15 U.S.C. § 6851 allow for an award of costs. Plaintiff requests at a minimum \$5,000.00 in costs and expenses of this action.

38. No part of the judgment sought has been paid.

**IV. CONCLUSION**

39. I have demonstrated diligent efforts with Defendant knowledgeable of these Court proceedings, **EXHIBITS 7 and 9**, with Defendant making a conscious decision not to plead, answer or otherwise defend my action against him. The party against whom it seeks a judgment of affirmative relief is not an infant, in the military, or an incompetent person. I support the motion for Default Judgment against Jonathan Rees aka Greg Ellis.

Executed on January 6, 2025.

  
\_\_\_\_\_

Jane Doe

Plaintiff